

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Eugene Pate v. Mylan Laboratories Ltd., et  
al.,*

Case No. 1:20-cv-01248-RBK-JS

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PATRICIA JACOB**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendant Mylan Pharmaceuticals Inc. will take the deposition upon oral examination of Patricia Jacob, on **November 9, 2021 at 11:00 a.m. EST**, and continuing until completion, via Zoom video conference. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached here.

The attorney contact for the deposition is:

Frank H. Stoy  
PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-4397

[fhs@pietragallo.com](mailto:fhs@pietragallo.com)

Dated: November 8, 2021

Respectfully submitted,

*s/ Clem C. Trischler*

Clem C. Trischler

Jason M. Reefer

Frank H. Stoy

PIETRAGALLO GORDON ALFANO BOSICK &

RASPANTI, LLP

One Oxford Centre, 38th Floor

Pittsburgh, PA 15219

412-263-2000 Telephone

412-263-2001 Facsimile

[cct@pietragallo.com](mailto:cct@pietragallo.com)

[jmr@pietragallo.com](mailto:jmr@pietragallo.com)

[fhs@pietragallo.com](mailto:fhs@pietragallo.com)

*Attorneys for Defendants Mylan*

*Pharmaceuticals Inc., Mylan Laboratories*

*Ltd., Mylan Inc., and Mylan N.V.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Clem C. Trischler

Clem C. Trischler

**EXHIBIT A**

**DEFINITIONS**

1. “You,” “your,” and any variants thereof means Patricia Jacob, FNP, her representatives, administrative or personal assistants, agents, legal representatives, and all other persons acting on her behalf or under his supervision.

2. “Plaintiff” shall refer to Plaintiff Eugene Pate.

3. “Defendants” shall refer to named defendants in this case, including Defendants Mylan Laboratories Ltd.; Mylan N.V.; Mylan Pharmaceuticals Inc.; Zhejiang Huahai Pharmaceutical Co., Ltd.; Teva Pharmaceuticals USA, Inc.; and any of their directors, agents, servants, employees, and representatives.

4. “Lawsuit” shall refer to *Eugene Pate v. Mylan Laboratories Ltd., et al.*, Case No. 1:20-cv-01248-RBK-JS, currently pending in the United States District Court for the District of New Jersey.

5. “Document” shall refer to all writings and recordings, including, but not limited to, any kind of written, printed, typed, electronic, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including originals, all copies, and all drafts, and both sides thereof, and including papers, photographs, films, recordings, memoranda, books, pamphlets, corporate manuals, records, accounts, analyses, communications, and all retrievable information in computer storage. Each copy of any such document which bears or omits distinct writings shall be deemed a separate document subject to production hereunder.

6. “Communication” shall mean the transmittal of information in the form of facts, ideas, inquiries, or otherwise by any means including, but not limited to, in person conversations,

phone conversations, messages, letters, emails or any other forms of writing or verbal communications.

7. “Person” shall include any natural person or any business, legal or governmental entity or association.

8. “Relating to” and “related to” shall mean mentioning, describing, discussing, memorializing, concerning, consisting of, containing, evidencing, pertaining to, reflecting, depicting or referring in any way, directly or indirectly, to the subject matter of the request.

9. “Concerning” shall mean containing, evidencing, regarding, referring to, relating to, pertaining to, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, or constituting.

10. The singular form of a word shall refer to the plural, and words used in the masculine gender shall also include the feminine or neutral, and vice-versa whenever necessary to bring within the scope of these Requests any information that might otherwise be construed to be outside their scope.

### **REQUESTS**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. Your current and up-to-date resume or *Curriculum Vitae*.